

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ADARIUS SCOTT

Criminal No. **20-136**
(18 U.S.C. § 371)
[UNDER SEAL]

FILED

JUN 23 2020

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

INDICTMENT

COUNT ONE

The grand jury charges:

THE CONSPIRACY AND ITS OBJECTS

1. From in and around May 2019, and continuing thereafter until on or about July 2, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, ADARIUS SCOTT, knowingly and willfully did conspire, combine, confederate and agree with other persons both known and unknown to the grand jury, to commit offenses against the United States, that is:

- a. Theft of Mail, in violation of Title 18, United States Code, Section 1708;
- b. Making, Uttering, and Possessing a Forged Security, in violation of Title 18, United States Code, Section 513(a); and,
- c. Bank Fraud, in violation of Title 18, United States Code, Section 1344(1).

MANNER AND MEANS OF THE CONSPIRACY

2. It was a part of the conspiracy that the defendant, ADARIUS SCOTT, and other individuals known to the grand jury, agreed to steal mail matter from the United States mail, mail receptacles, and from authorized mail depositories in the Western District of Pennsylvania and elsewhere for the purpose of stealing legitimate checks contained in the mail.

3. It was further part of the conspiracy that the legitimate checks were drawn on accounts of businesses operating in and the activities of which affect interstate commerce.

4. It was further part of the conspiracy that the legitimate checks were drawn at accounts of financial institutions then insured by the Federal Deposit Insurance Corporation including but not limited to Wells Fargo Bank, N.A., JP Morgan Chase Bank, NA, and PNC Bank N.A.

5. It was further part of the conspiracy that individuals not known to the grand jury created altered versions of the legitimate checks by changing the "payee" from the original payee to a different payee with the intent to deceive the entities accepting the altered checks.

6. It was further part of the conspiracy that the defendant, ADARIUS SCOTT, and others known and the unknown to the grand jury, recruited individuals with identification to cash the fraudulent checks.

OVERT ACTS

7. In furtherance of the conspiracy, and to effect the objects of the conspiracy, the defendant, ADARIUS SCOTT, with other persons both known and unknown to the grand jury, did commit and cause to be committed, the following overt acts, among others, in the Western District of Pennsylvania and elsewhere:


a. In and around July 2019, the defendant, ADARIUS SCOTT, and another individual known to the grand jury, agreed to steal mail matter from the United States mail, mail receptacles, and from authorized mail depositories in the Western District of Pennsylvania; and,

b. On or about July 1, 2019, and July 2, 2019, the defendant, ADARIUS SCOTT, and another individual known to the grand jury, attempted to recruit individuals located in the Western District of Pennsylvania to cash altered checks.

In violation of Title 18, United States Code, Section 371.

A True Bill,

Foreperson


SCOTT W. BRADY
United States Attorney
PA ID No. 88352